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BENJAMIN KAMINECKI,	:	UNITED STATES DISTRICT COURT
DAVID KAMINECKI,	:	DISTRICT OF NEW JERSEY
STACEY EDELMAN-KAMINECKI and	:	CAMDEN VICINAGE
JOSHUA EDELMAN,	:	
	:	
Plaintiffs	:	
	:	
vs.	:	
	:	CIVIL ACTION NO. 04CV1494
SCOTTSDALE INSURANCE COMPANY,	:	
ET AL	:	
	:	
Defendant	:	
	:	

NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT TO
FRCP 56 L. CIV. R. 7.1(b)

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PLEASE TAKE NOTICE, that the undersigned attorney for Defendant, Scottsdale Indemnity Company, will move before the United States District Court for the District of New Jersey, Camden Vicinage, on Friday, November 19, 2004, at 9:30 a.m. or as soon thereafter as counsel may be heard for an Order granting Partial Summary Judgment in favor of the Defendant, Scottsdale Indemnity Company, and dismissing Plaintiffs' Complaint and Intervenor's Complaint as pertaining to the claims against the liability policy issued to the Strand Corporation, policy number CPS0332871.

Undersigned counsel will rely on the attached Brief in support of this application and requests oral argument.

PRUTTING & LOMBARDI

S/George A. Prutting, Jr.

BY: _____
GEORGE A. PRUTTING, JR.